

ORIGINAL
BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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Mailing Online Service)

Docket No. MC98-1

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
(OCA/USPS-14-15)
(December 7, 1998)

Pursuant to sections 25 and 26 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits interrogatories and requests for production of documents. Instructions included with OCA interrogatories OCA/USPS-T1-1-7 to witness Lee Garvey, dated July 21, 1998, are hereby incorporated by reference.

Respectfully submitted,



Gail Willette
Acting Director
Office of the Consumer Advocate



Emmett Rand Costich
Acting Assistant Director



OCA/USPS-14. In response to Issue 2 of NOI No. 1 (concerning the feasibility and desirability of dispensing presort discounts through an automated rebate system), Postal Service witness Garvey stated, “[T]he difficulties of tracking and matching *each piece’s* origin to its ultimate qualifying rate would multiply the complexity many times over.” Tr. 6/1505 (emphasis added).

- a. Please define “origin” as used here.
- b. Please confirm that all pieces of a particular MOL mailing remain in a single batch (whether combined with other mailings or not) prior to presorting. That is, pieces from one mailing will not end up in more than one batch prior to presorting. If you do not confirm, please explain, provide an example of the “splitting” of an MOL mailing among batches, and provide an estimate of the frequency of this phenomenon.
- c. Please confirm that the postage charge for a batch (whether consisting of one or several separate mailings) is the same whether calculated before or after distribution to print sites. That is, since print sites are defined by ZIP Codes, no presort bundles, trays, containers, etc. would be “broken” by distributing to print sites. If you do not confirm, please explain, provide an example of the “breaking” of presort by distributing batches to print sites, and provide an estimate of the frequency of this phenomenon.
- d. Please confirm that the total postage bill, the total number of pieces, and the average postage charge per piece can be determined for each job-type/page-count batch. If you do not confirm, please explain, provide an example of a

batch for which this information cannot be determined, and provide an estimate of the frequency of this phenomenon.

- e. Please explain why it would be complex or difficult to determine the postage charge for an MOL mailing by multiplying the number of pieces in the mailing by the average postage charge per piece for the batch with which the mailing was combined.
- f. Please explain in greater detail why it would be complex or difficult to rebate the difference between the ex ante and ex post postage charges (ignoring accounting regulations, which are the subject of another interrogatory).

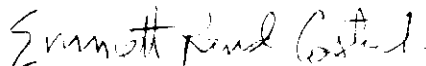
OCA/USPS-15. In response to a question from Commissioner Goldway (concerning the ability of the Postal Service to provide an ex post postage charge to MOL customers), Postal Service witness Garvey stated, "The problem is that we have a requirement to have payment for postage in hand when we take the mail"

Tr. 6/1521.

- a. Please identify the "requirement" to which witness Garvey referred.
 - b. Please provide a copy of any document setting forth the "requirement" to which witness Garvey referred.
 - c. Is the Postal Service legally precluded from exempting MOL from the "requirement" to which witness Garvey referred? If so, please explain.
 - d. Are there reasons other than legal preclusion that would discourage the Postal Service from exempting MOL from the "requirement" to which witness Garvey referred? If so, please explain.
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CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.

A handwritten signature in cursive script that reads "Emmett Rand Costich".

Emmett Rand Costich
Attorney

Washington, D.C. 20268-0001
December 7, 1998